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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA – SAN JOSE DIVISION

In re
GLADYS SALDANA,
Debtor.

Case No. 16-50436-MEH

Chapter 11

**AMENDED STIPULATION
REGARDING DEADLINE TO FILE
OPPOSITION TO DEBTOR'S
OBJECTION TO PENNYMAC
HOLDINGS, LLC'S PROOF OF CLAIM**

Hearing: [not yet scheduled]

Date:

Time:

Crtm:

This Amended Stipulation Regarding Deadline to file Opposition to Debtor's Objection to PennyMac Holdings, LLC's Proof of Claim ("Stipulation") is entered into between PennyMac Holdings, LLC (hereinafter "PennyMac"), by and through its counsel of record Aldridge Pite, LLP, and Gladys Saldana (hereinafter "Debtor"), by and through her attorney of record, the Law Offices of Charles B. Greene, as follows:

RECITALS

1. On or about July 20, 2007, Hector M. Saldana ("Borrower"), for valuable consideration, made, executed and delivered to Washington Mutual Bank, FA ("Lender") an Adjustable Rate Promissory Note in the principal sum of \$1,300,000.00 (the "Note"). The Note is

1 endorsed and payable in blank.

2 2. On or about July 20, 2007, Borrower made, executed and delivered to Lender a Deed
3 of Trust (the "Deed of Trust") granting Lender a security interest in certain real property located at
4 2590 Bentley Ridge Dr., San Jose, CA 95138 (hereinafter, the "Subject Property"), which is more
5 fully described in the Deed of Trust.

6 3. The Deed of Trust was subsequently assigned to PennyMac.

7 4. On February 16, 2016, Debtor filed the instant Chapter 11 bankruptcy petition in the
8 Northern District of California-San Jose Division, and was assigned case number 16-50436.

9 5. On June 21, 2016, PennyMac filed a Proof of Claim ("Claim") in the Debtor's
10 bankruptcy case, which reflects a secured claim in the amount of \$1,888,381.55, with pre-petition
11 arrears in the amount of \$745,339.28. The pre-petition arrears consist of: (1) principal and interest
12 payments of \$492,187.62, (2) prepetition fees and costs in the amount of \$11,451.30; (3) an escrow
13 deficiency of \$174,114.92, (4) escrow shortage of \$174,114.92; and (5) less funds held in suspense
14 in the amount of \$797.18.

15 6. On October 12, 2016, the Debtor filed her Objection to PennyMac's Proof of Claim
16 (the "Objection") wherein Debtors alleges that PennyMac's claim is overstated.

17 7. The Parties have met and conferred regarding the Debtor's Objection, and mutually agree
18 that the deadline for PennyMac's Opposition shall be extended to and including January 23, 2017.

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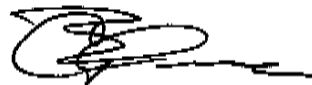
1 **THE PARTIES HEREBY STIPULATE AND AGREE TO AN ORDER AS FOLLOWS:**

2 1. The deadline for PennyMac's Opposition to the Objection is extended to and
3 including January 23, 2017.

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5 **IT IS SO STIPULATED:**

6 **LAW OFFICES OF CHARLES B. GREENE**

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8 Dated: 1/2/17

9 By: 
Charles B. Greene
Attorney for Debtor

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11
12 **ALDRIDGE PITE, LLP**

13
14 Dated: January 2, 2017

15 By: /s/ Jonathan C. Cahill
Jonathan C. Cahill (SBN 287260)
Attorney for PennyMac Holdings, LLC